

EXHIBIT 2

From: [Scott Klein](#)
To: [Robert MacGill](#); [Steve Mintz](#)
Cc: [Bundren, Brandon](#); [Gene Besen](#); [Kathy Klein](#); [Matt Pietsch](#); [Patrick Sanders](#); [Scott Murray](#); [Terence McCormick](#); [Alex Otchy](#)
Subject: RE: Guidepost Discovery (FRCP 30(b)(6))
Date: Friday, February 23, 2024 3:31:34 PM
Attachments: [image001.png](#)
[image002.png](#)

Rob,

Thanks for the email.

Guidepost is not available on Feb 28. From Guidepost's perspective, our current plan is to have Krista Tongring be Guidepost's 30(b)(6) corporate representative.

Since her individual deposition has not been rescheduled yet, we propose doing them both on the same day.

Based on Ms. Tongring's availability, we propose March 20 or March 21. Ms. Tongring is away the entire week of March 4 on business and is traveling parts of the following week. As a backup, Ms. Tongring can try to make herself available on March 13, but that would have to be held in NYC.

This will give the parties time to meet and confer on both the topics and the document requests, and then conduct both depositions in one day.

Please let us know if this works for you, and we also should try to coordinate/confirm these dates with EC and SBC counsel.

Regards,
Scott



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